

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ISAIAH SANO,

Plaintiff,

**NOTICE OF MOTION**

-against-

22-CV-07688 (DLI)(TAM)

THE CITY OF NEW YORK, POLICE OFFICER DEVIN  
MOSES, POLICE OFFICER PATRICK SANON,  
DETECTIVE PATRICK FLYNN,

Defendants.

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**PLEASE TAKE NOTICE** that defendants the City of New York, Police Officer Devin Moses, Police Officer Patrick Sanon, and Detective Patrick Flynn, upon the accompanying Memorandum of Law, dated July 5, 2023, and upon all prior pleadings and proceedings had herein, will move this Court before the Honorable Dora L. Irizarry, United States District Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, at a date and time to be determined by the Court, for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, of dismissal with prejudice, together with such other relief as the Court deems just and proper on the grounds that plaintiff has failed to state a claim against defendants upon which relief can be granted.

**PLEASE TAKE FURTHER NOTICE** that answering papers, if any, are to be served by July 19, 2023; and

**PLEASE TAKE FURTHER NOTICE** that reply papers, if any, are to be served by July 26, 2023.

Dated: New York, New York  
July 5, 2023

HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel of the City of New York  
*Attorney for Defendants City, Moses, Sanon, Flynn*  
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By: \_\_\_\_\_

Joseph A. Russo  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: Via ECF  
Caner Demirayak, Esq.  
*Attorney for Plaintiff*